

Questions for TCEQ on Exide RCRA permit, December 10, 2012

1. Based upon our previous discussions the facility is closing under the existing permit 2001 and approved Closure Plan from 1997. What is the time frame for final closure?
2. Have there been any discussions about Exide being able to clean close the two RCRA Permitted units?
3. We have some general concerns about verification sampling, around the two RCRA units. Will additional samples be required once foundations and paving are removed?
4. The permit required corrective action for SWMUs. An RFI for 5 SWMUs was required: Raw material Storage Area; Slag Landfill; North Disposal Area; South Disposal Area; and Steward Creek. As far as we could determine only Steward Creek was completed. There was some documentation that indicated additional work was required on the other SWMUs. Any time frame for completion of this work?
5. Will corrective action on any additional areas of concern be through the existing permit?
6. How does the VCP agreement on the J-Parcel affect migration of contamination from the permitted plant site?
7. What about contamination outside of the J-Parcel?
8. How will the slag landfill be handled? According to maps showing the facility boundary this area was not part of the permitted site. Is there a separate solid waste or industrial waste permit for this area? Any groundwater monitoring requirements? Closure requirements?
9. Any discussion with Exide on how they would handle long term monitoring if it is required?
10. In the transfer agreement with the City, the "Lake Parcel" is described as being in the permitted boundary and transfer will not occur until this parcel is removed from the permit boundaries. What investigation requirements can be imposed upon this parcel prior to allowing the modification of the permit?
11. The agreement also discusses the City assuming site maintenance and monitoring activities of the Bowtie Parcel. Has this been discussed with TCEQ? If long term monitoring or post closure care is required City may need to agree to the permit conditions.